



Department of Energy
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JUL 22 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0343-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF THE RESPONSES TO COMMENTS ON THE AREA 9, PHASE III
OUTFALL DITCH PREDESIGN INVESTIGATION (SUPPLEMENT TO 20300-PSP-0011)**

- References:
- 1) Letter DOE-0264-04, W. Taylor to J. Saric/T. Schneider, "Transmittal of the Project Specific Plan for Area 9, Phase III Outfall Ditch Predesign Investigation (Supplement to 20300-PSP-0011)," dated May 25, 2004
 - 2) Letter, J. Saric to J. Reising, "A9 P3 Outfall Ditch Predesign Investigation," dated June 16, 2004
 - 3) Letter, T. Schneider to W. Taylor, "Comments on PSP for A9P3 Outfall Ditch Predesign Investigation," dated June 22, 2004

Enclosed for your approval are the responses to the United States Environmental Protection Agency (USEPA) comments (Reference 2) and Ohio Environmental Protection Agency (OEPA) comments (Reference 3) on the Project Specific Plan for Area 9, Phase III Outfall Ditch Predesign Investigation (Supplement to 20300-PSP-0011) submitted in May (Reference 1).

JUL 22 2004

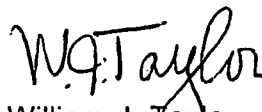
Mr. James A. Saric
Mr. Tom Schneider

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DOE-0343-04

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosure: As Stated

cc w/enclosure:

J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

N. Akgündüz, OH/FCP
K. Johnson, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
K. Alkema, Fluor Fernald, Inc./MS1
J. Chiou, Fluor Fernald, Inc./MS64
M. Frank, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
W. Hooper, Fluor Fernald, Inc./MS60
S. Lorenz, Fluor Fernald, Inc./MS41
F. Miller, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO
U.S. AND OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE PROJECT SPECIFIC PLAN FOR
AREA 9, PHASE III OUTFALL DITCH PREDESIGN INVESTIGATION
(SUPPLEMENT TO 20300-PSP-0011)**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

JULY 2004

U.S. DEPARTMENT OF ENERGY

ORIGINAL COMMENTS

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| 6. | Commenting Organization: Ohio EPA Section #: 1.1 Original Comment #: 1 | Pg #: 1-1 | Commenter: OFFO Line #: 14-15 | Code: C |
| | Comment: | This line states that information from this sampling will be used to develop the excavation approach for removing the old outfall line. According to the weekly call between DOE and the EPA's, an excavation plan as well as a CDL and PSP have already been written and are on the way to the agencies. Ohio EPA expects all excavation plans to contain results from predesign sampling. | | |
| | Response: | Agree. | | |
| | Action: | The excavation plan will be revised to include results from predesign sampling. | | |
| 7. | Commenting Organization: Ohio EPA Section #: General Original Comment #: 2 | Pg #: | Commenter: OFFO Line #: | Code: C |
| | Comment: | Numerous times in this document references are made to historical data, but the amount and nature of all historical data is never presented, it only mentions of above FRL hits. Please present a map with all historical sampling locations. Ohio EPA is unable to ascertain if the number of sampling points presented in this plan are adequate to characterize this area without knowing where historical data shows below FRL locations. No maps or data are presented which would indicate the amount of coverage over the outfall line footprint. Please provide more details. | | |
| | Response: | During a meeting with OEPA, several maps were presented as draft that showed the above information. These maps will be incorporated into the PSP. | | |
| | Action: | Incorporate maps and data that reference historical sampling events. | | |
| 8. | Commenting Organization: Ohio EPA Section #: 2.1.2.3.2.1.2 Original Comment #: 3 | Pg #: 2-3 | Commenter: OFFO Line #: 32-35 | Code: C |
| | Comment: | This section states that sampling will be performed to access residual contamination in the area of the 1989 overflow and remediation. Samples are to be collected to a depth of 1.5 feet. According to section 2.1.1, the area was excavated to a depth of 2 feet and backfilled. Therefore, in order to capture residual contamination, sampling will need to be performed below the depth of backfill. | | |
| | Response: | The historical sampling that was performed in response to the 1989 overflow event were collected over an approximate XX' x YY' area. The remediation described in the document only covered an area of X' x Y' and did not expand over a single investigation point. Therefore, the 1.5' depth of confirmation sampling is representative of historical conditions. | | |
| | Action: | None. | | |

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE
PROJECT SPECIFIC PLAN FOR AREA 9, PHASE III OUTFALL DITCH PREDESIGN
INVESTIGATION (SUPPLEMENT TO 20300-PSP-0011)**

SPECIFIC COMMENTS

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| 1. | Commenting Organization: U.S. EPA Section #: 2.1.2.1 Original Specific Comment #: 1 Comment: The text states that 54 boring locations in the investigation have been selected for analysis. However, the table presented in Appendix B indicates that 55 boring locations are proposed for investigation. The text or the table in Appendix B should be revised to resolve this discrepancy. Response: Agree. This was a typographical error in the text. Action: The text will be changed to 55 boring locations | Commenter: Saric Line #: 2 and 3 Code: |
| 2. | Commenting Organization: U.S. EPA Section #: 2.1.2.3.2.1.3 Original Specific Comment #: 2 Comment: The text states that sampling locations for the area surrounding Manhole 181 are presented in Figure 2-3. Sampling locations for Manhole 181 are actually presented in Figure 2-4. The text should be revised to resolve this discrepancy. Response: Agree. Action: The text will be changed to reference Figure 2-4. | Commenter: Saric Line #: 13 Code: |
| 3. | Commenting Organization: U.S. EPA Section #: 2.1.2.3.2.2 Original Specific Comment #: 3 Comment: The text states that there were final remediation level (FRL) exceedances for total thorium and total uranium in four borings near the Great Miami River bank by the outfall line discharge. The text should be revised to refer to Figure 2-5, which shows the locations of the four borings. Response: Agree. Action: The text will be changed to reference Figure 2-5. | Commenter: Saric Line #: 22 and 23 Code: |
| 4. | Commenting Organization: U.S. EPA Section #: 2.1.2.3.2.3 Original Specific Comment #: 4 Comment: The text states that boring location 1532 had an FRL exceedance for Cs-137 and will be investigated using proposed boring A9P3-MH181-16. The text should be revised to refer to Figure 2-4, which shows the boring locations. Response: Agree. Action: The text will be changed to reference Figure 2-4. | Commenter: Saric Line #: 1 and 2 Code: |
| 5. | Commenting Organization: U.S. EPA Section #: Figure # 2-3 Original Specific Comment #: 5 Comment: The figures shows 17 proposed predesign sampling locations for the Manhole 180 area. However, the table presented in Appendix B indicates that 18 samples will be collected in the Manhole 180 area. Figure 2-3 or the table in Appendix B should be revised to resolve this discrepancy. Response: Agree. Action: Variance 21140-PSP-0002-01 corrects the discrepancy in Appendix B. | Commenter: Saric Line #: NA Code: |